Exhibit 2

Art. 9 – It is assumed, and no evidence to the contrary will be allowed, that companies not founded in Argentina that provide transportation services between the Republic and foreign countries obtain net profits from the Argentine source equal to TEN PERCENT (10 %) of the gross amount of the freights for passengers and cargo corresponding to these transport services.

In addition, it is assumed, and no evidence to the contrary will be allowed, that the TEN PERCENT (10 %) of the amounts paid by companies located or founded in Argentina to foreign shipping companies for freight by time or by trip, constitute net profits from an Argentine source.

The assumptions mentioned in the preceding paragraphs will not apply to companies founded in countries in which, as a result of international agreements or treaties, a tax exemption has been established.

In the case of companies not founded in Argentina that are active in the transportation container business in the Republic or from here to foreign countries, it is assumed, and no evidence to the contrary will be allowed, that they obtain net profits for this activity from the Argentine source equal to TWENTY PERCENT (20 %) of the gross revenues obtained for this activity.

The agents or representatives in Argentina of the companies mentioned in this article will have joint and several liability with them for payment of the tax.

Profits obtained by companies founded or located in Argentina, which conduct the activities referred to in the preceding paragraphs are considered to be received fully from Argentine source, regardless of where they carry out their activities.

Art. 69 – Companies will be subject to the following rates on their net taxable profits:

a) Thirty-five percent (35%):

1. Corporations and partnerships limited by shares, in the part that corresponds to the general partner, founded in Argentina.

2. Limited liability companies, limited partnerships and the part corresponding to the limited partners of the partnerships limited by share, in all cases in regard to companies founded in Argentina.

3. Civil associations and foundations founded in Argentina when no other mandatory treatment is established by this law.

4. Joint venture companies, in regard to the part of the profits that is not tax-exempt.

5. The entities and organisms referred to in article 1 of law no. 22.016, not covered in the previous items, provided that no other treatment must be given them as a result of article 6 of that law.

6. Trusts founded in Argentina, in accordance with the provisions of law no. 24.441, except those in which the grantor has the status of beneficiary. The exception established in this paragraph will not be applied in the cases of financial trusts or when the grantor-beneficiary is a party covered in title V.

7. The mutual funds established in Argentina, not covered in the first paragraph of article 1 of law no. 24.083 and its amendments.

The parties mentioned in the preceding items are covered by this section from the date of founding until the date of the respective contract, as applicable.

For the purpose of the provisions in items 6 and 7 of this section, the individuals or legal entities that assume the position as guarantors and the companies that manage the mutual investment funds, respectively, are covered in section e), of article 16, of law no. 11.683, a text enacted in 1978 and its amendments.

b) At thirty-five percent (35%):

Commercial, industrial, agricultural, mining or any other type of establishment, organized as a stable company, belonging to associations, companies or businesses, whatever their nature, founded abroad or to individuals that reside abroad.

This section does not cover companies founded in Argentina, without prejudice to the application of the provisions in article 14, its related and supporting articles.

However, revenues from games of chance in casinos (roulette, baccarat, blackjack, poker and/or any other authorized game) and of conducting betting through the use of electronic games of chance and/or automated betting (whether providing immediate results or not) and/or through digital platforms will be taxed at a rate of forty-one percent (41.50%). The rate mentioned will apply for both individuals and legal entities. *(Paragraph added by Art. 1, point 3 of law no. 27.346 B.O. 12/27/2016. Effectiveness: beginning with its publication in the Official Gazette, and it will produce effects for the fiscal years underway on the date of effectiveness of the law in reference).*

The Federal Public Revenue Agency, which is part of the Ministry of Public Finance, will establish the operating conditions for the application of this rate and for the appropriation of expenses incurred for the purpose of obtaining, maintaining and conserving earnings covered by the previous paragraph, pursuant to the first paragraph of article 80 of this law. *(Paragraph incorporated by art. 1, point 3 of law No. 27.346 B.O. 27/12/2016. Effectiveness: beginning with its publication in the Official Gazette, and it will produce effects for the fiscal years underway on the date of effectiveness of the law in reference).*

(Article replaced by Law No. 25.063, Title III, art.4, section o). - Effectiveness: beginning with its publication in the Official Gazette, and it will produce effects for the fiscal years ending after this law goes into effect, or, as the case may be, the fiscal year underway on that date.)

Art. ... – When the parties indicated in items 1,2,3,6 and 7 of section a) of article 69, as well as those indicted in section b) of the same article, pay dividends, or, as the case may be, distribute profits in cash, which exceed the earnings determined based on the application of the general rules set forth in this law, accumulated at the end of the fiscal year immediately preceding the date of that payment or distribution, thirty-five percent (35%) of that surplus shall be withheld, with the nature of a single and definitive payment.

For the purpose of the provisions in the preceding paragraph, the profits to be considered in each fiscal year will be those that result after deducting from the profits determined by application of the general rules in this law, the tax paid for the fiscal year(s) in which the profits were earned or the corresponding proportional part, adding to it the dividends or profits from other companies not calculated in the determination of those profits in the same fiscal year(s).

In the case of dividends or cash profits, the withholding indicated with be made by the party that performed the distribution or the paying agent, without prejudice to the right to demand repayment by the beneficiaries and to delay the delivery of assets until this has been done.

The provisions in this article do not apply to financial trusts in which the certificates of participation are sold by public offer, in the cases and conditions established by the legislation in this regard.

(Article incorporated below into art. 69 by Law No. 25.063, Title III, art.4, section p). – Effectiveness: beginning with its publication in the Official Gazette, and it will produce effects for the fiscal years ending after this law goes into effect, or, as the case may be, the fiscal year underway on that date.)

AFIP
TAX
CUSTOMS
SOCIAL SECURITY

International Agreements

For specific consultations on Agreements published on this page, go to International Affairs Area, mailbox **asuntosinternacionales@afip.gov.ar**

Agreements

Mutual Assistance and Cooperation Agreements

☐ Tax
☐ Customs
☐ Tax Customs
☐ Social Security Resources

Agreements

Agreements to Avoid Double International Taxation	
Signatory country	Law number
GERMANY	22025/1979 - See 25332/2000 - See
AUSTRALIA	25238/1999 – See
AUSTRIA	22589/1982–See terminated 01/01/2009
BELGIUM	24850/1997 - See
BOLIVIA	21780/1978 - See
BRAZIL	Amendment Protocol – Not in effect
CANADA	24398/1994 - See
CHILE	Agreement Memorandum Law No. 27.274 See
DENMARK	24838/1997 - See
UNITED ARAB EMIRATES	Agreement: (Not in effect)
SPAIN	Agreement: Law 26918/2013 Protocol
FINLAND	24654/1996 - See
FRANCE	22357/1980 - See 26276/07 - See
ITALY	22747/1983 - See 25396/2000 - See
MEXICO	Agreement–Law 27.334
NORWAY	25461/2001 - See
HOLLAND	24933/1997 - See

UNITED KING.	24727/1996 - See
RUSSIA	26185-2006 - See
SWEDEN	24795/1997 - See
SWITZERLAND	27010 /2014.See

Letters of Commitment

☐ Tax

☐ Customs

Other International Instruments

- Agreement between AFIP and the National Customs of the Pluri-national State of Bolivia on Electronic Seals (PEMA)
- Agreement between AFIP and RFB on mutual assistance and cooperation in customs matters (Electronic Customs Monitoring Seals)
- Agreement between AFIP and RFB on the exchange of spectrograph images
- Agreement between AFIP and the General Customs Office of the Republic of Paraguay on mutual assistance and cooperation in customs matters - PEMA (Electronic Customs Monitoring Seals)
- Agreement on Technical Assistance for the Optimization of Control and Facilitation of International Trade between AFIP and the National Customs of Bolivia.
- Agreement between AFIP of the Republic of Argentina and the National Customs Service of the Republic of Ecuador on Technical Assistance Agreement in customs matters.
- Best Practices Exchange Agreement between the National Customs Office of the Republic of Angola and the Federal Revenue Office
- Technical Assistance Agreement in customs matters AFIP- Paraguay
- Technical Assistance Agreement in customs matters AFIP - Uruguay

Technical Agreement AFIP – France

- AFIP-AEAT Collaboration Agreement - 2001 -
- Final Minutes of 16th Meeting of Economic-Commercial Mixed Commission Argentina and China- 2006
- AIRCOP Airport Communications ONU - AFIP – Ministry of Safety
- European Community – Southern Common Market
- Technical Assistance Agreement AFIP-CIAT
- Cooperation Agreement with the Honduran DEI – Tax Education
- Framework Agreement of Collaboration and Technical Assistance in Training and Investigation between CIAT and AFIP
- Megaport Initiative.
- Memorandum of Understanding between AFIP and RFB about execution of a Joint Plan for Mutual Recognition of their respective Authorized Economic Operator Programs
- Memorandum of Understanding AFIP – State Undersecretary of Taxation of the Republic of Paraguay
- Memorandum of Understanding AFIP – University of Canberra

- Protocol of Collaboration AFIP-IEF
- OECD-Convention on Combatting Bribery of Foreign Civil Servants
- Trade Framework Agreement between MERCOSUR and the State of Israel
- Free Trade Treaty between the State of Israel and MERCOSUR
- UNDOC



Tuesday, 07 November 2017

To Whom It May Concern,

We, TrustPoint Translations, hereby certify that, to the best of our knowledge, the English documents attached to this letter:

"International Agreements (tax exemptions)_EN" and "Art 9 and 69_EN"

are true and accurate translations of the original Spanish documents ("International Agreements (tax exemptions)" and "Income Tax Law, Articles 9 and 69") provided to us by VedderPrice.

If there is any further information we can provide you, please do not hesitate to contact us.

Yours sincerely,

Ashley Schroeder
Director of Operations
TrustPoint Translations, LLC